

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

**DAWN WOOTEN,**

*Plaintiff,*

**VS.**

**CIVIL ACTION NO. 7:22-cv-00148-WLS**

**LASALLE MANAGEMENT COMPANY,  
L.L.C, LASALLE SOUTHEAST, LLC,  
and DAVID PAULK, an individual,**

*Defendants.*

---

**MOTION FOR PROTECTIVE ORDER BY  
DEFENDANTS LASALLE SOUTHEAST, LLC AND DAVID PAULK**

---

**COME NOW**, Defendants LASALLE SOUTHEAST, LLC and DAVID PAULK (“Defendants”), and respectfully move this Honorable Court to enter a Protective Order in this matter enabling the parties to this matter to designate material as confidential as needed for the efficient and prompt development of discovery. Defendants have attempted to confer with Plaintiff regarding a proposed Protective Order in accordance with this Court’s Scheduling/Discovery Order, but Plaintiff has not agreed to Defendants’ reasonable draft Protective Order. Accordingly, Defendants now seek the intervention of the Court for the entry of this Protective Order.

For the reasons set forth in its *Memorandum in Support of Motion for Protective Order*, filed contemporaneously herewith, Defendants respectfully request that this Court enter a protective order entitling the parties to designate proprietary business information, personally identifying information, trade secrets, and other non-public information as confidential, and for other and further relief as this Court deems just and proper.

THIS, the 20th day of June, 2025.

Respectfully submitted,

**LASALLE SOUTHEAST LLC AND DAVID  
PAULK**

By: s/ Magdalen B. Bickford

Magdalen B. Bickford

One of its Attorneys

**OF COUNSEL:**

DEIRDRE C. MCGLINCHEY (*Pro Hac Vice*)

Louisiana Bar Roll #24167

MAGDALEN BLESSEY BICKFORD (*Pro Hac Vice*)

Louisiana Bar Roll #17472

ANDREW M. ALBRITTON (*Pro Hac Vice*)

Louisiana Bar Roll #39780

McGLINCHEY STAFFORD, PLLC

601 Poydras Street, 12<sup>th</sup> Floor

New Orleans, Louisiana 70130

Telephone (504) 586-1200 | Fax: (504) 596-2800

Email: dmcglinchey@mcglinchey.com;

mbickford@mcglinchey.com;

aalbritton@mcglinchey.com

and

JOHN T. ROUSE (GA Bar No. 868514)

McGLINCHEY STAFFORD, PLLC

1020 Highland Colony Pkwy, Ste. 406

Ridgeland, Mississippi 39157

Telephone: (769) 524-2329 | Fax: (601) 608-7871

Email: jrouse@mcglinchey.com

*Counsel for LaSalle Southeast LLC and David Paulk*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of June, 2025, a true and correct copy of the foregoing has been electronically filed with the clerk of court using the CM/ECF system, which will send Notice of Electronic filing to all counsel of record.

THIS, the 20th day of June, 2025.

/s Andrew M. Albritton

ANDREW M. ALBRITTON